

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES DBP/USPS-19 THROUGH 27**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated August 3, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-19** Please describe the procedure and regulatory requirements that would have to be followed by each of the different types of Alternate Access Sites in the event that they wanted to discontinue operation.

**RESPONSE**

Non-postal alternate access channels operate under the terms of contracts with the Postal Service that are usually renewable. Those contracts have notice provisions in the event that the contractor should wish to terminate or not renew. The Postal Service is not aware that the willingness or commitment of a vendor to continue operating as an alternate access channel, or a decision by such a vendor to discontinue, is subject to procedures or regulations of an agency such as the Postal Regulatory Commission.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-20** A picture of a potential Village Post Office shows a blue collection box in front of the facility.

- [a] Is it the intention of the Postal Service to provide a blue collection box at each of the Village Post Offices?
- [b] If not, why not?
- [c] What provisions will be made for collecting mail from this box?
- [d] What final collection times will be required for these blue collection boxes?
- [e] Please provide the changes that will be made to the collection requirements provided in the Postal Operations Manual.

**RESPONSE**

- (a-c) See the response to POIR 1, Question 10.
- (d) Should a collection box be established outside the premises of a commercial retail location that operates a VPO, the box would be subject to collection in accordance with existing policies.
- (e) No changes are being contemplated at this time in relation to VPOs.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-21**

- [a] Is it the intention of the Postal Service to provide a blue collection box at each of the Alternate Access Sites?
- [b] If not, why not?
- [c] What provisions will be made for collecting mail from this box?
- [d] What final collection times will be required for these blue collection boxes?
- [e] Please provide the changes that will be made to the collection requirements provided in the Postal Operations Manual.

**RESPONSE**

- (a) If by alternate access sites, you are referring to all non-postal alternate access channels, the answer is negative.
- (b) Current policy does not reflect a universal requirement. No change in current policy is being contemplated in connection with the RAO Initiative as none is deemed necessary.
- (c) In light of the response to subparts (a) and (b), the reference to "this box" is not clear.
- (d) See the response to subpart (c). The reference to "these boxes" is not clear.
- (e) See the response to subpart (b).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-22**

- [a] Is it a requirement of the Postal Service to provide a blue collection box at each of its postal facilities that are not in the category of an Alternate Access Site?
- [b] If not, why not?
- [c] What provisions will be made for collecting mail from this box?
- [d] What final collection times will be required for these blue collection boxes?

**RESPONSE**

- (a-b) For purposes of this question, it is assumed that facilities operated by the Postal Service are not "alternate access sites." There is no policy requiring that a blue collection box be erected at the site of each facility the Postal Service operates; however, they are required at all Cost Ascertainment Group A–K Post Offices and at all classified stations and branches.
- (c-d) The references to "this box" and "these" boxes are not sufficiently clear for responses to these questions to be attempted.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-23** There has been an extensive consolidation of Business Mail Entry Units ["BMEU"].

- [a] Please describe the changes that have already been made in the availability of BMEUs.
- [b] What future plans are there for further consolidation?
- [c] How will the proposed Docket affect the ability of mailers to access a BMEU?

**RESPONSE**

The basis for the assertion that "[t]here has been extensive consolidation" of BMEUs is unclear. Consolidations of postal operations outside the scope of the RAO Initiative are ongoing but are beyond the scope of this proceeding.

- (a) If a mail processing plant is fully consolidated, or if a postal retail facility is discontinued (or its BMEU function consolidated), the responsibilities of its BMEU are assigned to another nearby facility.
- (b) The Postal Service has not developed a future plan for "further consolidation" of BMEUs. However, it is reasonable to assume that the number of BMEUs could be reduced in the future as a result of future mail processing plant consolidation and retail facility discontinuance activity.
- (c) If a retail facility is discontinued as a result of the RAO Initiative and it currently houses a BMEU, the responsibilities of that BMEU would be transferred to one or more nearby postal facilities. Mailers would be informed of those locations and would have to adjust by entering their mail at those nearby entry units.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-24**

- [a] Please describe the type and extent of training that is provided to a retail window clerk at a post office.
- [b] Please describe the type and extent of training that will be provided to an operator at each of the different types of Alternate Access Sites including a Village Post Office.

**RESPONSE**

Post Office retail window clerks are provided such training as is sufficient to enable them to sell and provide the various services and products listed in response to DBP/USPS-6. It is reasonable to expect this training to be more extensive than that experienced by personnel at alternative access sites, whose training will vary on the basis of the range of services provided at their locations. For example, one should expect that a Contract Postal Unit employee will require more "postal" training than an Approved Shipper, whose training will tend to be more extensive than a VPO employee who, in turn, will require more training than a cashier at a retail store that only sells Forever Stamps on consignment.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-25**

Please describe the training and oaths that are required of all employees, contractors, and operators that have custody of the mail with respect to the security of the mail and sanctity of First-Class Mail.

**RESPONSE**

It is irrelevant to the advisory opinion request in this docket whether: (a) upon employment, postal employees take an oath that specifically addresses the security or sanctity of First-Class Mail; or (b) any similar oath is administered to employees of an Approved Shipper that accepts First-Class Mail or a FedEx pilot who transports First-Class Mail. Accordingly no research has been undertaken on this issue.

Postal employees and parties who take custody of mail in accordance with contractual arrangements with the Postal Service are informed by the Postal Service of the security to be afforded First-Class Mail and the private nature of its content. The specific nature of the information communicated to these persons is not relevant to issues raised by the request in this docket. Accordingly, no description of the "training" or other transmission of that information is being provided.



**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-26** Please describe the compensation received or payment made by the operator of each of the types of Alternate Access Sites including a Village Post Office. The amount of the compensation does not have to be provided unless it is a nominal amount such as \$1 only which way any payment is made or if there is no compensation involved.

**RESPONSE**

For VPOs, see the response to POIR 1, Question 12.

Contract Postal Unit operators are compensated in accordance with contracts with the Postal Service.

Approved Shippers are provided signage, but are otherwise not compensated.

A fixed rate commission is paid for management of the consignment program and maintaining relationships with consignees (retailers). Select consignment retailers are compensated by USPS for achieving specific levels of sales performance. Consignees receive signage from the Postal Service.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-27** The Postal Service utilizes the term "Village Post Office".

[a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at a Village Post Office.

[b] Please provide a listing of those postal services that are available at a Village Post Office that are not available at an independent post office or classified station/branch.

**RESPONSE**

(a-b) Please compare the information provided in response to DBP/USPS-6 to the information provided in response to Question 10 of POIR 1.